



MACOM Technology Solutions Holdings, Inc.
100 Chelmsford Street
Lowell, MA, 01851
United States of America

Strengthening Protections Against the Trafficking in Persons

MACOM Technology Solutions Holdings, Inc. (MACOM) is committed to conducting its business in an ethical and responsible manner. MACOM prohibits forced labor, slavery, and trafficking in persons in connection with its operations. We are also committed to compliance with the US Federal Acquisitions Regulation (Executive Order 13627), the California Transparency in Supply Chains Act, the UK Modern Slavery Act, the recent Countering America's Adversaries Through Sanctions Act (CAATSA) and the US Tariff Act.

Legislation

- Executive Order 13627, Strengthening Protections Against Trafficking in Persons in Federal Contracts, prohibits contractors or subcontractors to the federal government from engaging in human trafficking and includes additional prohibitions when using recruiters/agents.
- The California Transparency in Supply Chain Act and the UK Modern Slavery Act requires companies to disclose their efforts to ensure their supply chains are free from slavery and human trafficking.
- CAATSA presumes that goods, wares, merchandise, and articles mined, produced, or manufactured wholly or in part by North Korean citizens or nationals anywhere in the world are forced labor, and as such are prohibited from importation into the United States
- The US Tariff Act prohibits the importation of merchandise mined, produced, or manufactured, wholly or in part, in any foreign country by convict, forced or indentured labor.

MACOM Policy

MACOM employees, contractors, subcontractors, vendors, suppliers, partners, recruiters, and others through whom MACOM conducts business must comply with relevant regulations and must not engage in any practice that constitutes forced labor, slavery or trafficking in persons, including:

- Engaging in forced, indentured, child, or debt-bonded labor, illegal movement of persons, or sexual exploitation;
- Destroying, confiscating, concealing, or otherwise denying access to an individual's identity or immigration documents;
- Using fraudulent or misleading practices during the recruitment of candidates or offering of employment/contract positions for the purpose of slavery or trafficking in persons;
- Making material misrepresentation during the recruitment of employees regarding the key terms and conditions of employment;
- Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place;
- Charging applicants/candidates recruitment fees;
- Failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment, if legally or contractually required;
- Failing to provide or arrange housing that meets the host country's housing and safety standards, if legally or contractually required; or
- Failing to provide an employment contract, recruitment agreement, or other required work document in writing, in a language the employee understands, if legally or contractually required.
- Failing to ensure that no North Korean citizens or nationals have been involved in the mining, production, or manufacturing wholly or in part, of any goods, articles, or merchandise (including parts & components) supplied to MACOM.

To demonstrate our commitment to this policy and the above-mentioned legislation, MACOM is implementing a compliance plan which will include the following measures:

- Internal accountability standards and procedures to assure compliance with relevant laws and regulations.
- All MACOM personnel are obliged to comply with our Policy Against Forced Labor and Trafficking in Persons. Targeted training materials are delivered to MACOM personnel whose actions and decisions are most likely to increase or decrease risks of trafficking and slavery.
- MACOM expects its suppliers to comply with all labour laws relevant to the country in which they operate, along with our Policy. MACOM's standard purchase terms and conditions, supplier agreements, along with our Supplier Quality Manual, include provisions on trafficking and slavery.
- We assess risk in our operations, along with our supply chain using global reports and standards, such as the Global Slavery Index and U.S. Department of State's Trafficking in Persons Report. Based on the results of the risk assessment, MACOM identifies suppliers where additional due diligence and more in-depth risk assessment is required.
- Due diligence activities are carried out based on the results of our risk assessment in accordance with regulatory requirements and the OECD's Due Diligence Guidance on Responsible Business Conduct. We request all relevant suppliers to submit data using the Slavery & Trafficking Risk Template (STRT). The STRT is an industry-standard data exchange template that measures suppliers' vulnerability to modern slavery and human trafficking occurring in their own operations and/or in their supply chains. The STRT obtains information about suppliers' operating contexts, their processes, policies, and practices, as well as any measures they have in place to identify, prevent, and manage risks related to human trafficking and slavery.
- We further request suppliers to ensure the information provided is accurate, complete and relevant to MACOM's products. We also request that relevant suppliers ensure their MACOM-related value chains meet comparable compliance expectations. Through the efforts outlined above, MACOM attempts to ensure that its supply chain is operating in the responsible manner.
- Remediation activities take place in accordance with our internal procedures, if upon investigation, we discover violations with our policy or instances of trafficking and slavery.
- In accordance with the requirements of the California Transparency in Supply Chain Act MACOM will publicly disclose our efforts to manage risks associated with trafficking and slavery.

For further information or to voice any concerns relevant to MACOM, regarding trafficking in persons slavery or forced labor, please contact us at humanrights@macom.com.

Sincerely,

Therese Deane
Snr. Director, Global Compliance & Quality Systems